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8 Attorneys for Defendants, COUNTY OF SHASTA,
9 JIM POPE, PAT LANHAM, CITY OF REDDING,
10 LEONARD MOTY (erroneously sued herein as
11 LARRY F. MOTY), Officer REBECCA ZUFALL,
12 Officer KRISTEN FREDRICK, Officer JASON BEEMAN,
13 Corporal WALT BULLINGTON, Officer BRIAN MAGLEBY,
14 Officer MATT ZALESNY, Officer GREG WILKES,
15 Officer DAVID SCHULZ (erroneously sued herein as
16 Officer Schultz), Sergeant STEVE MORAVEC, and
17 Sergeant JOHN OSTROWSKI

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19 UNITED STATES DISTRICT COURT

20 FOR THE EASTERN DISTRICT OF CALIFORNIA

21 LONNY L. HODGES,

Case No. CIV.S-04-2535 GEB KJM

22 Plaintiff,

23 vs.

**STIPULATION FOR ENTRY OF A
PROTECTIVE ORDER**

24 COUNTY OF SHASTA; CITY OF REDDING;
25 LARRY F. MOTY, Chief of Police; JIM
26 POPE, Shasta County Sheriff, Deputy
27 PAT LANHAM; Officer ZUFALL; Officer
28 FREDRICK; Officer BEEMAN Corporal
BULLINGTON; Officer MAGLEBY;
Officer ZALES, Officer ZALESNY;
Officer WILKES Officer SCHULTZ;
Officer MORAVEC; Officer FREDRICK;
Officer OSTROWSKI; DOES OFFICERS 1-
15, inclusive,

29 Defendants.

30 /

31 Plaintiff has requested discovery of certain materials contained
32 in the personnel file of defendant Police Officer MATTHEW ZALESNY
33 which includes the Internal Affairs Investigation of a complaint
34 against Officer Zalesny arising out of an earlier incident.
35 Defendants have agreed to produce the Internal Affairs Investigation

1 on the condition that the disclosure shall be subject to a protective
2 order that defendants shall not distribute the Internal Affairs
3 Investigation materials to anyone and shall return those materials
4 upon the conclusion of this lawsuit as more fully set forth in the
5 attached proposed order.

6 The parties hereby stipulate that the court may enter the
7 attached proposed order and that it shall be effective from this date
8 forward.

9 DATED: February 21, 2006.

BRICKWOOD LAW OFFICE

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/s/ MONIQUE GRANDAW

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MONIQUE GRANDAW

Attorneys for Defendants

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DATED: February 9, 2006.

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/s/ LARRY LAVERNE BAUMBACH

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LARRY LAVERNE BAUMBACH

Attorneys for Plaintiff

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PROTECTIVE ORDER

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The Court has reviewed the Stipulation for a Protective Order and
20 good cause appearing makes the following Order:

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IT IS ORDERED:

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To plaintiff LONNY L. HODGES, your agents, employees, attorneys
23 and anyone acting on your behalf, YOU ARE ORDERED AS FOLLOWS:

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1. You may not copy, duplicate or reproduce any part of the
25 Internal Affairs Investigation arising out of the complaint against
26 Zalesny as referred to in response to plaintiff's Request for
27 Production of Documents Set No. 1, Request No. 20, except as necessary
28 to exchange information between the parties to these proceedings or

1 their respective attorneys or agents during the pendency of this case.

2. You may not convey, transfer, publish or distribute the
3 documents or information in the Internal Affairs Investigation or
4 authorize another to do so except between the parties to the
5 proceedings or their respective attorneys or agents during the
6 pendency of this case.

7 YOU ARE FURTHER ORDERED to return all copies of the Internal
8 Affairs Investigation provided to you at the final conclusion of the
9 present proceeding to the attorney for the City of Redding and Zalesny
10 in this action, Gary Brickwood, at 1135 Pine Street, Suite 210,
11 Redding, California 96001.

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13 DATED: March 10, 2006.

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16 UNITED STATES MAGISTRATE JUDGE
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